



COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

*D.T.C. 13-7 – Intercarrier Compensation  
Reform Inquiry*

Technical Workshop  
August 15, 2013

Staff Data Overview

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# Overview of Data

1. FCC activity and requirements
2. MA tariffing requirements
3. Summary of revisions received by Dept.
4. Rates and data filing examples

**\*\* Refer to separate attachment for Staff Discussion Topics**

# Key FCC Activity – re: ICC

## *General:*

1. [USF/ICC Transformation Order](#) (FCC 11-161; rel. 11/18/11)
2. [Sua Sponte Order on Reconsideration](#) (FCC 11-189; rel. 12/23/11)
3. [Clarifying Aspects of USF/ICC Order I](#) (DA 12-147; rel. 2/3/12)
4. [Clarifying Aspects of USF/ICC Order II](#) (DA 12-298; rel. 2/27/12)
5. [USF/ICC Third Order on Reconsideration](#) (FCC 12-47; rel. 5/14/12)
6. [Clarifying Aspects of USF/ICC Order III](#) (DA 12-870; rel. 6/5/12)
7. [Clarifying Aspects of USF/ICC Order V](#) (DA 13-564; rel. 3/27/13)

## *ILEC Interstate Access Tariff Orders:*

1. [July 3, 2012 Annual Access Charge Tariff Filings](#) (DA 12-482; rel. 3/28/12)
2. [Material to be Filed in Support of 2012 Annual Access Tariff Filings](#) (DA 12-575; rel. 4/19/12)
3. [July 2, 2013 Annual Access Charge Tariff Filings](#) (DA 13-553; rel. 3/26/13)
4. [Material to be Filed in Support of 2013 Annual Access Tariff Filings](#) (DA 13-789; rel. 4/19/13)

<b>Intercarrier Compensation Reform Timeline 2011-2013</b>		
<b>Effective Date</b>	<b>For Price Cap Carriers and CLECs that benchmark access rates to price cap carriers</b>	<b>For Rate-of-Return Carriers and CLECs that benchmark access rates to rate-of-return carriers</b>
December 29, 2011	All intercarrier switched access rate elements, including interstate and intrastate originating and terminating rates and reciprocal compensation rates are capped.	All interstate switched access rate elements, including all originating and terminating rates and reciprocal compensation rates are capped. Intrastate terminating rates are also capped.
July 3, 2012	Intrastate terminating switched end office and transport rates, originating and terminating dedicated transport, and reciprocal compensation rates, if above the carrier's interstate access rate, are reduced by 50 percent of the differential between the rate and the carrier's interstate access rate.	Intrastate terminating switched end office and transport rates, originating and terminating dedicated transport, and reciprocal compensation rates, if above the carrier's interstate access rate, are reduced by 50 percent of the differential between the rate and the carrier's interstate access rate.
July 2, 2013	Intrastate terminating switched end office and transport rates, originating and terminating dedicated transport rates, and reciprocal compensation, if above the carrier's interstate access rate, are reduced to parity with interstate access rate.	Intrastate terminating switched end office and transport rates, originating and terminating dedicated transport rates, and reciprocal compensation, if above the carrier's interstate access rate, are reduced to parity with interstate access rate.

## Intercarrier Compensation Reform Timeline 2014-2018/2020

Effective Date	For Price Cap Carriers and CLECs that benchmark access rates to price cap carriers	For Rate-of-Return Carriers and CLECs that benchmark access rates to rate-of-return carriers
July 1, 2014	Terminating switched end office and reciprocal compensation rates are reduced by one-third of the differential between end office rates and <b>\$0.0007</b> .	Terminating switched end office and reciprocal compensation rates are reduced by one-third of the differential between end office rates and <b>\$0.005</b> .
July 1, 2015	Terminating switched end office and reciprocal compensation rates are reduced by an additional one-third of the original differential to <b>\$0.0007</b> .	Terminating switched end office and reciprocal compensation rates are reduced by an additional one-third of the original differential to <b>\$0.005</b> .
July 1, 2016	Terminating switched end office and reciprocal compensation rates are reduced to <b>\$0.0007</b> .	Terminating switched end office and reciprocal compensation rates are reduced to <b>\$0.005</b> .
July 1, 2017	Terminating switched end office and reciprocal compensation rates are reduced to bill-and-keep.  Terminating switched end office and transport are reduced to \$0.0007 for all terminating traffic within the tandem serving area when the terminating carrier owns the serving tandem switch.	<b>Terminating end office and reciprocal compensation rates are reduced by one-third of the differential between its end office rates (\$0.005) and \$0.0007.</b>
July 1, 2018	Terminating switched end office and transport are reduced to bill-and-keep for all terminating traffic within the tandem serving area when the terminating carrier owns the serving tandem switch.	<b>Terminating switched end office and reciprocal compensation rates are reduced by an additional one-third of the differential between its end office rates as of July 1, 2016 and \$0.0007.</b>
July 1, 2019		<b>Terminating switched end office and reciprocal compensation rates are reduced to \$0.0007.</b>
July 1, 2020		Terminating switched end office and reciprocal compensation rates are reduced to bill-and-keep.

# The FCC envisions an ongoing state role during the transition.

•[S]tate oversight of the transition process is necessary to ensure that carriers comply with the transition timing and intrastate access charge reductions [...] *Under our framework, rates for intrastate access traffic will remain in intrastate tariffs* [...] [S]tate commissions should monitor compliance with our rate transition; review how carriers reduce rates to ensure consistency with the uniform framework; and guard against attempts to raise capped intercarrier compensation rates, as well as unanticipated types of gamesmanship [...] *[S]tates could require carriers to provide additional information and/or refile intrastate access tariffs that do not follow the framework or rules adopted in this Order.* Moreover, state commissions will continue to review and approve [ICAs] and associated reciprocal compensation rates to ensure that they are consistent with the new federal framework and transition. (FCC 11-161, ¶ 813, emphasis added)

•[States] will continue to oversee the tariffing of intrastate rate reductions during the transition period as well as interconnection negotiations and arbitrations pursuant to sections 251 and 252, and will have responsibility for determining the network “edge” for purposes of bill-and-keep. (FCC 11-161, ¶ 790)

# MA Tariffing Requirements

- [M.G.L. c. 159](#), § § 13-14, 17, 19-20:
  - Every common carrier shall file with the department and *shall plainly print [tariffs] showing all rates* [...] for any service, of every kind rendered or furnished, or to be rendered or furnished, by it within the commonwealth, and all conditions and limitations, rules and regulations and forms of contracts or agreements in any manner affecting the same, *in such places, within such time, and in such form and with such detail as the department may order* [...] (§ 19, emphasis added)
  - “Just and reasonable” standard
  - Statutory 30-day filing period, unless Dept. permits shorter filing time
  - Authorizes Dept. to inquire into and investigate
- [220 C.M.R. § § 5.00 et seq.](#)
  - Tariffs and schedules shall show plainly all requisite detail fully to explain the basis of all charges to be made and all rules and regulations governing the same (§ 5.02(3)(b))
- Dept. Practice and Requirements – See, e.g.:
  - [Notices to carriers](#)
  - [Tariff FAQ](#)
  - [Department Checklist for Filings](#)

# The MA Circumstance

- At least 60 companies have a switched access tariff on file with the Dept., including some placeholder tariffs.
- Dept. reforms, which preceded the FCC's actions, capped CLECs' composite, per-minute switched access rates, originating and terminating, at no higher than the ILEC's rates (Docket DTC 07-9)
- When Dept. staff receive access revisions, they compare against company's existing interstate and intrastate tariffs, as well as against the dominant ILEC's tariffs.
- Many carriers' interstate rates *exceed* their corresponding intrastate rates. Exceptions: some carriers with Host Remote Elements actually exceed interstate access rates.
- Not all interstate and intrastate access tariff rate structures correspond.

# Typical Composite Example

	Intrastate DTC 07-9 Cap	Interstate Verizon FCC No. 11
•Local Transport Termination, per minute	\$0.000000	\$0.000000
•Local Transport Facility (LTF), per mile-per minute	\$0.000003	\$0.000002
•Tandem Switching, per minute	\$0.001068	\$0.001574
•Local Switching, per minute	\$0.002124	\$0.002406
•Shared End Office Trunk Port, per minute	\$0.001598	\$0.001688
<b>Composite Rate</b>	<b><u>\$0.00482</u></b>	<b><u>\$0.00567</u></b>

# Competitive Carrier Tariff Comparison with Host Remote Elements

	Intrastate switched access composite rates approved in 07-9 compliance filing	Interstate switched access rates - FCC
Local Switching - Rate per Access Minute (a)	0.00212400	0.00240600
Host-Remote Transport Term. - per Minute (b)	0.00072700	0.00000000
Host-Remote Transport Term. - per Minute/Mile (c)	0.00012700	0.00000000
Host-Remote Mileage Assumption (d)	12	0.00000000
Host-Remote Mileage Additive (e)	0.35	0.00000000
<b>Originating/Terminating Direct Transport <math>a+[b+c*d]*e</math></b>	<b>0.00291185</b>	<b>0.00240600</b>
Local Switching - Rate per Access Minute (a)	0.00212400	0.00240600
Host-Remote Transport Term. - per Minute (b)	0.00072700	0.00000000
Host-Remote Transport Term. - per Minute/Mile (c)	0.00012700	0.00000000
Host-Remote Mileage Assumption (d)	12	0.00000000
Host-Remote Mileage Additive (e)	0.35	0.00000000
Common Trans. - per Minute per Mile (D) (f)	0.00003000	0.00000200
End Office to Access Tandem, miles (g)	12	12
Access Tandem Switching - per Minute (h)	0.00106800	0.00157400
Access Tandem Switching - CTP - per Minute (i)	0.00159800	0.00168800
<b>Originating/Terminating Direct/Tandem Combination <math>a+[b+c*d]*e+f*g+h+i</math></b>	<b>0.00593785</b>	<b>0.00569200</b>

# ICC Tariff and ICA Filings 2012 and 2013

- ICC filings received:
  - to reduce the Local Transport Facility element (2012 and 2013),
  - to reduce intrastate composite rates with Host Remote Elements (2012 and 2013),
  - Rural ILECs tied to NECA's tariff for their interstate rates which were lower than intrastate rates (2012 and 2013)
    - Note: All filed to reduce their rates
  - to include VoIP-PSTN tariff provisions (2012)
  - to increase intrastate rates to interstate levels (2012 and 2013)
    - Note: These were mostly withdrawn by the company or Dept. did not permit to go into effect.
  - to match Verizon's new rates effective July 1, 2013
    - Note: Revisions to match Verizon's new rates currently pending
  - to update rate structure (2012 and 2013) - some carriers changed to composite rates; others broke out rate elements; others created composite "originating" and "terminating" rates
  - do not yet address recip comp rates.
  - 2012 Confidentiality Requests granted via Letter Orders. 2013 requests still pending.
- Number of filings:
  - 2012:
    - Appx. 44 ICC filings received in 2012 from CLECs, including appx. 27 rate reduction filings
    - Appx. 67 VoIP-PSTN tariff filings, including revisions, received from 42 carriers
    - Several ICA amendments between Verizon and CMRS providers establishing bill-and-keep for IntraMTA traffic
  - 2013:
    - Appx. 35 ICC tariff filings and counting

# Verizon's New Rates Effective July 1, 2013, DTC 07-9 Rates and Interstate Rates Comparison

	Originating intrastate rates		Terminating intrastate rates		Interstate rates FCC No. 11
	DTC 07-9	eff. July 1, 2013	DTC 07-9	eff. July 1, 2013	
Local Switching, per min (A)	0.002124	0.002302	0.002124	0.002297	0.002406
Shared Trunk Port, per min (B)	0.001598	0.001688	0.001598	0.001688	0.001688
Local Transport Termination, per min (C)	0.000000	0.000000	0.000000	0.000000	0.000000
Local Transport Facility (LTF), per minute per mile (D)	0.000003	0.000002	0.000003	0.000002	0.000002
Tandem Switching, per min (E)	0.001068	0.001538	0.001068	0.001574	0.001574
Host Remote transport termination, per min (F)	0.000727	0	0.000727	0	0
Host Remote transport facility, per min per mile (G)	0.000127	0	0.000127	0	0
Composite Direct Access (A+B)	0.003722	0.003990	0.003722	0.003985	0.004094
Composite w/o tandem switching (A+B+C+D)	0.003752	0.003992	0.003752	0.003987	0.004096
Composite w/ tandem switching (A+B+C+D+E)	0.004820	0.005530	0.004820	0.005561	0.005670
Composite w/ host remote (A+B+C+D+E+F+G)	0.005674	0.005530	0.005674	0.005561	0.005670

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I
DTE NO. 15 TARIFF			12/29/2011			PROPOSED	INTRA RATE	PROPOSED
SECTION	RATE ELEMENT	DIRECTION	RATE	VOLUME	BASE REVENUE	INTRA RATE	CHANGE	INTRASTATE REVENUE
<b>INTRASTATE END OFFICE ACCESS SERVICES RATED AT INTRASTATE RATES</b>								
30.6.9	Local Switching-Per access minute	ORIG	\$0.002124			\$0.002302	Increase *	
30.6.9	Local Switching-Per access minute	TERM	\$0.002124			\$0.002297	Increase *	
30.6.9	Dedicated Trunk Port	BOTH	\$12.00			\$11.25	Reduction	
30.6.9	Dedicated Trunk Port	TERM	\$12.00			\$11.25	Reduction	
30.6.9	Shared Trunk Port	ORIG	\$0.001598			\$0.001688	Increase	
30.6.9	Shared Trunk Port	TERM	\$0.001598			\$0.001688	Increase	
30.6.9	LS-INSTALLATION-NRC	BOTH	\$60.00			\$1.00	Reduction	
30.6.9	LS-INSTALLATION-NRC	TERM	\$60.00			\$1.00	Reduction	
<b>INTRASTATE TANDEM SWITCHED TRANSPORT SERVICES RATED AT INTRASTATE RATES</b>								
30.6.5	Tandem Switching-Per MOU	ORIG	\$0.001068			\$0.001538	Increase *	
30.6.5	Tandem Switching-Per MOU	TERM	\$0.001068			\$0.001574	Increase	
30.6.3	Local Transport Termination-Per MOU	ORIG	\$0.000000			\$0.000000		
30.6.3	Local Transport Termination-Per MOU	TERM	\$0.000000			\$0.000000		
30.6.4	Local Transport Facility-Per Mile, Per MOU	ORIG	\$0.000030			\$0.000002	Reduction	
30.6.4	Local Transport Facility-Per Mile, Per MOU	TERM	\$0.000030			\$0.000002	Reduction	
30.6.7	Host/Remote Transport-Termination-Per MOU	ORIG	\$0.000727			\$0.000000	Reduction	
30.6.7	Host/Remote Transport-Termination-Per MOU	TERM	\$0.000727			\$0.000000	Reduction	
30.6.7	Host/Remote Transport-Facility-Per MOU-Per Mile	ORIG	\$0.000127			\$0.000000	Reduction	
30.6.7	Host/Remote Transport-Facility-Per MOU-Per Mile	TERM	\$0.000127			\$0.000000	Reduction	
30.6.5	Tandem Dedicated Trunk Port Charge	BOTH	\$12.00			\$12.06	Increase *	
30.6.5	Tandem Dedicated Trunk Port Charge	TERM	\$12.00			\$12.06		
<b>INTRASTATE DEDICATED TRANSPORT ACCESS SERVICE RATED AT INTRASTATE RATES</b>								
<b>VOICE GRADE</b>								
30.6.1	VOICE GRADE-ENTRANCE FACILITY-2W-MONTHLY		\$25.16			\$14.00	Reduction	
30.6.1	VOICE GRADE-ENTRANCE FACILITY-2W-NRC-FIRST		\$263.85			\$1.00	Reduction	
30.6.1	VOICE GRADE-ENTRANCE FACILITY-2W-NRC-ADDITIONAL		\$179.85			\$1.00	Reduction	
30.6.1	VOICE GRADE-ENTRANCE FACILITY-4W-MONTHLY		\$50.53			\$26.02	Reduction	
30.6.1	VOICE GRADE-ENTRANCE FACILITY-4W-NRC-FIRST		\$375.68			\$1.00	Reduction	
30.6.1	VOICE GRADE-ENTRANCE FACILITY-4W-NRC-ADDITIONAL		\$251.11			\$1.00	Reduction	
30.6.2	VOICE GRADE-DIRECT TRUNKED TRANSPORT-FIXED		\$14.25			\$16.93	Increase	
30.6.2	VOICE GRADE-DIRECT TRUNKED TRANSPORT-PER MILE		\$2.07			\$3.00	Increase	
<b>DS1</b>								
30.6.1	DS1-ENTRANCE FACILITY-MONTHLY		\$190.00			\$190.00		
30.6.1	DS1-ENTRANCE FACILITY-NRC-FIRST		\$618.09			\$275.00	Reduction	
30.6.1	DS1-ENTRANCE FACILITY-NRC-ADDITIONAL		\$353.52			\$275.00	Reduction	
30.6.1	DS1-ENTRANCE FACILITY-2-YR-TERM-MONTHLY		\$171.00			\$171.00		
30.6.1	DS1-ENTRANCE FACILITY-2-YR-TERM-NRC		\$1.00			\$1.00		
30.6.1	DS1-ENTRANCE FACILITY-3-YR-TERM-MONTHLY		\$152.00			\$152.00		
30.6.1	DS1-ENTRANCE FACILITY-3-YR-TERM-NRC		\$1.00			\$1.00		

30.6.1	DS1-ENTRANCE FACILITY-5-YR-TERM-MONTHLY	\$133.00	\$133.00
30.6.1	DS1-ENTRANCE FACILITY-5-YR-TERM-NRC	\$1.00	\$1.00
30.6.1	DS1-ENTRANCE FACILITY-7-YR-TERM-MONTHLY	\$123.50	\$123.50
30.6.1	DS1-ENTRANCE FACILITY-7-YR-TERM-NRC	\$1.00	\$1.00
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-FIXED	\$54.00	\$54.00
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-PER MILE	\$16.80	\$16.80
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-2-YR-TERM-FIXED	\$48.60	\$48.60
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-2-YR-TERM-PER MILE	\$15.12	\$15.12
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-3-YR-TERM-FIXED	\$43.20	\$43.20
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-3-YR-TERM-PER MILE	\$13.44	\$13.44
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-5-YR-TERM-FIXED	\$37.80	\$37.80
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-5-YR-TERM-PER MILE	\$11.76	\$11.76
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-7-YR-TERM-FIXED	\$35.10	\$35.10
30.6.2	DS1-DIRECT TRUNKED TRANSPORT-7-YR-TERM-PER MILE	\$10.92	\$10.92
30.6.8	DS1-MULTIPLEXING TO VOICE GRADE	\$210.00	\$210.00
30.6.8	DS1-MULTIPLEXING TO VOICE GRADE-2-YR-TERM	\$189.00	\$189.00
30.6.8	DS1-MULTIPLEXING TO VOICE GRADE-3-YR-TERM	\$168.00	\$168.00
30.6.8	DS1-MULTIPLEXING TO VOICE GRADE-5-YR-TERM	\$147.00	\$147.00
30.6.8	DS1-MULTIPLEXING TO VOICE GRADE-7-YR-TERM	\$136.50	\$136.50
<b>DS3</b>			
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 1	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 2	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 3	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 4	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 5	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 6	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 7	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 8	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 9	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 10	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 11	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 12	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 13	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 14	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 15	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 16	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 17	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 18	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 19	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 20	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 21	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 22	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 23	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 24	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-MONTHLY-RATE BAND 25+	\$1,204.32	\$1,204.32
30.6.1	DS3-ENTRANCE FACILITY-NRC	\$1.00	\$1.00
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 1	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 2	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 3	\$1,083.89	\$1,083.89

30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 4	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 5	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 6	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 7	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 8	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 9	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 10	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 11	\$1,083.89	\$1,080.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 12	\$1,083.89	\$981.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 13	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 14	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 15	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 16	\$1,083.89	\$1,083.89
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 17	\$1,083.89	\$1,080.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 18	\$1,083.89	\$1,071.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 19	\$1,083.89	\$1,057.50 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 20	\$1,083.89	\$1,035.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 21	\$1,083.89	\$1,026.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 22	\$1,083.89	\$1,008.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 23	\$1,083.89	\$994.50 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 24	\$1,083.89	\$990.90 Reduction
30.6.1	DS3-ENTRANCE FACILITY-3-YR TERM-MONTHLY-RATE BAND 25+	\$1,083.89	\$990.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 1	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 2	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 3	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 4	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 5	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 6	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 7	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 8	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 9	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 10	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 11	\$782.81	\$780.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 12	\$782.81	\$708.50 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 13	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 14	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 15	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 16	\$782.81	\$782.81
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 17	\$782.81	\$780.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 18	\$782.81	\$773.50 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 19	\$782.81	\$763.75 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 20	\$782.81	\$747.50 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 21	\$782.81	\$741.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 22	\$782.81	\$728.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 23	\$782.81	\$718.25 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 24	\$782.81	\$715.65 Reduction
30.6.1	DS3-ENTRANCE FACILITY-5-YR TERM-MONTHLY-RATE BAND 25+	\$782.81	\$715.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 1	\$722.59	\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 2	\$722.59	\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 3	\$722.59	\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 4	\$722.59	\$722.59

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30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 5	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 6	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 7	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 8	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 9	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 10	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 11	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 12	\$722.59		\$720.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 13	\$722.59		\$654.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 14	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 15	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 16	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 17	\$722.59		\$722.59
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 18	\$722.59		\$720.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 19	\$722.59		\$714.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 20	\$722.59		\$705.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 21	\$722.59		\$690.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 22	\$722.59		\$684.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 23	\$722.59		\$672.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 24	\$722.59		\$663.00 Reduction
30.6.1	DS3-ENTRANCE FACILITY-7-YR TERM-MONTHLY-RATE BAND 25*	\$722.59		\$660.00 Reduction
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-FIXED	\$825.00		\$825.00
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-PER MILE	\$159.15		\$159.15
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-3-YR-TERM-FIXED	\$742.50		\$742.50
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-3-YR-TERM-PER MILE	\$143.24		\$143.24
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-5-YR-TERM-FIXED	\$536.25		\$536.25
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-5-YR-TERM-PER MILE	\$103.45		\$103.45
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-7-YR-TERM-FIXED	\$495.00		\$495.00
30.6.2	DS3-DIRECT TRUNKED TRANSPORT-7-YR-TERM-PER MILE	\$95.49		\$95.49
30.6.8	DS3-MULTIPLEXING TO DS1	\$729.72		\$730.00 Increase *
30.6.8	DS3-MULTIPLEXING TO DS1-NRC	\$0.00		\$0.00
30.6.8	DS3-MULTIPLEXING TO DS1-3-YR-TERM	\$656.75		\$657.00 Increase *
30.6.8	DS3-MULTIPLEXING TO DS1-5-YR-TERM	\$474.32		\$474.50 Increase *
30.6.8	DS3-MULTIPLEXING TO DS1-7-YR-TERM	\$437.83		\$438.00 Increase *

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Notes:

\* Indicates rate increases that bring intrastate rate element to a rate lower than the interstate rate.

REDACTED VERSION

# Final remarks